

1 PAUL B. SALVATY (State Bar No. 171507)  
*PSalvaty@winston.com*

2 WINSTON & STRAWN LLP  
3 333 S. Grand Ave., 38th Fl.  
4 Los Angeles, CA 90071-1543  
Telephone: (213) 615-1700  
Facsimile: (213) 615-1750

5 ABBE DAVID LOWELL (*pro hac vice* forthcoming)  
*AbbeLowellPublicOutreach@winston.com*

6 WINSTON & STRAWN LLP  
7 1901 L St., N.W.  
8 Washington, D.C. 20036-3508  
Telephone: (202) 282-5000  
Facsimile: (202) 282-5100

9 Bryan M. Sullivan, State Bar Number 209743  
*bsullivan@earlysullivan.com*

10 Zachary C. Hansen, State Bar Number 325128  
*zhansen@earlysullivan.com*

11 EARLY SULLIVAN WRIGHT  
12 GIZER & McRAE LLP  
13 6420 Wilshire Boulevard, 17<sup>th</sup> Floor  
14 Los Angeles, California 90048  
Telephone: (323) 301-4660  
Facsimile: (323) 301-4676

15 Attorneys for PLAINTIFF  
ROBERT HUNTER BIDEN

16 **UNITED STATES DISTRICT COURT**  
17 **CENTRAL DISTRICT OF CALIFORNIA**  
18 **WESTERN DIVISION**

19 ROBERT HUNTER BIDEN, an  
20 individual,

21 Plaintiff,

22 vs.

23 PATRICK M. BYRNE, an individual,  
24 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**JOINT TRIAL EXHIBIT LIST**

**Pretrial** November 25, 2024  
**Conference:**  
**Time:** 3:00 p.m.

**Jury Trial** December 10, 2024  
**Time:** 9:00 a.m.

Judge: Hon. Stephen V. Wilson,  
Ct. 10A

Pursuant to Fed. R. Civ. P. 16 and Local Rule 16-2.3, Plaintiff Robert Hunter Biden (“Plaintiff”) and Defendant Patrick Byrne (“Defendant”) set forth the following proposed exhibits for trial. Plaintiff and Defendant expressly reserve the right to amend the Joint Trial Exhibit List to add documents obtained as a result of any additional discovery and as may be necessary for impeachment, rebuttal, or otherwise based upon the evidence adduced at trial.

**Case Title:** Robert Hunter Biden v. Patrick M. Byrne

**Case No:** 2:23-cv-09430-SVW-PD

<u>Ex. No.</u>	<u>Description</u>	<u>Date Identified</u>	<u>Date Admitted</u>
1.	Capitol Times Magazine, Issue 1, published on June 27, 2023 (RHB00001-99)		
2.	Telegram post by Defendant Patrick Byrne on March 20, 2022, including associated comments (RHB00695)		
3.	Telegram post by Defendant Patrick Byrne on April 7, 2022, including associated comments (RHB00696)		
4.	Telegram post by Defendant Patrick Byrne on October 20, 2022 reposting post from Qtime Network, including associated comments (RHB00697)		
5.	Telegram post by Defendant Patrick Byrne on December 12, 2022, including associated comments (RHB00698)		
6.	X post by Defendant Patrick Byrne on		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	January 5, 2023, including associated comments (RHB00718)		
7.	X post by Defendant Patrick Byrne on January 7, 2023, including associated comments (RHB00721)		
8.	X post by Defendant Patrick Byrne on February 10, 2023, including associated comments (RHB00699)		
9.	X post by Defendant Patrick Byrne on February 12 2023, including associated comments (RHB00700)		
10.	X post by Defendant Patrick Byrne on February 24, 2023, including associated comments (RHB00701)		
11.	X post by Defendant Patrick Byrne on March 17, 2023, including associated comments (RHB00100, RHB00702)		
12.	X post by Defendant Patrick Byrne on March 28, 2023 (RHB00110, 150)		
13.	X post by Defendant Patrick Byrne on April 17, 2023, including associated comments (RHB00716)		
14.	X post by Defendant Patrick Byrne on May 10, 2023, including associated comments (RHB00720)		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
15.	Screenshot of link to Defendant Patrick Byrne's May 10, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00186)		
16.	Screenshot of link to Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00187)		
17.	Transcript of Defendant Patrick Byrne's May 11, 2023 interview on <i>The Absolute Truth with Emerald Robinson</i> (RHB00711-RHB00715)		
18.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00101, 104)		
19.	X post by Defendant Patrick Byrne on May 12, 2023, including associated comments (RHB00102-103, 112-117, 119)		
20.	Telegram post by Defendant Patrick Byrne on June 24, 2023, including associated comments (RHB00703)		
21.	X post by Defendant Patrick Byrne on June 25, 2023, including associated comments (RHB00719)		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
22.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00151-152)		
23.	Telegram post by Defendant Patrick Byrne on June 27, 2023, including associated comments (RHB00153-155)		
24.	Telegram post by Defendant Patrick Byrne on June 28, 2023, including associated comments (RHB00157)		
25.	X post by Defendant Patrick Byrne on June 29, 2023, including associated comments (RHB00105-106)		
26.	Telegram posts by Defendant Patrick Byrne on July 4, 2023, including associated comments (RHB00156)		
27.	Telegram post by Defendant Patrick Byrne on July 5, 2023, including associated comments (RHB00158-161)		
28.	Telegram post by Defendant Patrick Byrne on July 6, 2023, including associated comments (RHB00162)		
29.	Telegram post by Defendant Patrick Byrne on July 21, 2023, including associated comments (RHB00163-164)		
30.	Screenshot of link to Defendant Patrick		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00185)		
31.	Transcript of Defendant Patrick Byrne's July 21, 2023 interview with Alex Jones on <i>The Alex Jones Show</i> (RHB00722-RHB00789)		
32.	Telegram post by Defendant Patrick Byrne on July 22, 2023, including associated comments (RHB00167)		
33.	Telegram post by Defendant Patrick Byrne on July 28, 2023, including associated comments (RHB00168)		
34.	Screenshot of link to Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i> (RHB00184)		
35.	Transcript of Defendant Patrick Byrne's September 8, 2023 interview on <i>The Courtenay Turner Podcast</i> , Episode 305: <i>Behind the Testimony of America's #1 Domestic Extremist w/ Patrick Byrne</i> (RHB00790-RHB00846)		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
36.	Telegram post by Defendant Patrick Byrne on September 17, 2023, including associated comments (RHB00169)		
37.	X post by Defendant Patrick Byrne on October 8, 2023 (RHB00147; Pg. 3 of Exhibit B to Plaintiff's Complaint)		
38.	X post by Defendant Patrick Byrne on October 8, 2023, including associated comments (RHB00146; Pg. 2 of Exhibit B to Plaintiff's Complaint)		
39.	X post by Rep. Eric Swalwell on October 8, 2023, including associated comments (RHB00143-145)		
40.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00125-126)		
41.	X post by @AzPinkLady on October 11, 2023, including associated comments (RHB00128)		
42.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00141-142)		
43.	X post by Defendant Patrick Byrne on October 17, 2023, including associated comments (RHB00148)		

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
44.	X post by Defendant Patrick Byrne on October 23, 2023, including associated comments (RHB00109)		
45.	October 26, 2023 Demand for Retraction Letter to Defendant Patrick Byrne, sent by Plaintiff's counsel of record (RHB00404-406)		
46.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00124, 149)		
47.	X post by Defendant Patrick Byrne on November 9, 2023, including associated comments (RHB00102-103, 112-117, 119)		
48.	Truth Social post by @RickRichGuillot on November 9, 2023, including associated comments (RHB00171)		
49.	X post by Defendant Patrick Byrne on November 10, 2023, including associated comments (RHB00118, 137)		
50.	X post by Defendant Patrick Byrne on November 13, 2023, including associated comments (RHB00108, 132)		
51.	Screenshot of link to Defendant Patrick Byrne's November 13, 2023 interview		



<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled “ <i>Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE</i> ” (RHB00183)		
52.	Transcript of Defendant Patrick Byrne’s November 13, 2023 interview with Roger Stone on his podcast <i>The StoneZONE with Roger Stone</i> , titled “ <i>Sued by Hunter Biden Former Overstock CEO Patrick Byrne Enters the StoneZONE</i> ” (RHB00847-RHB00864)		
53.	X post by @AzPinkLady on November 14, 2023, including associated comments (RHB00129-131)		
54.	Telegram post by Defendant Patrick Byrne on December 5, 2023, including associated comments (RHB00166)		
55.	Transcript from George Berges’ January 9, 2024 Congressional Transcribed Interview with the House Committee on Oversight and Accountability and House Committee on the Judiciary (RHB00266-403)		
56.	January 9, 2024 Letter to Rep James Comer, Chairman of the House Committee		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	on Oversight and Accountability, and Rep. Jim Jordan, Chairman of the House Committee on the Judiciary, from William Pittard, counsel for George Berges (RHB00407-410)		
57.	X post by @AzPinkLady on January 11, 2024 (RHB00134)		
58.	X post by @AzPinkLady on January 11, 2024 (RHB00135)		
59.	X post by Senator mark Kelly on January 11, 2024, including associated comments (RHB00136)		
60.	Telegram post by Scott Adams on February 4, 2024, including associated comments (RHB00165)		
61.	Truth Social post by Defendant Patrick Byrne on February 13, 2024, including associated comments (RHB00170)		
62.	Truth Social post by Defendant Patrick Byrne on February 22, 2024, including associated comments (RHB00172)		
63.	Text Thread between Defendant Patrick Byrne and Anil Anwar between March 16, 2024 to April 16, 2024 (Byrne_0000021)		
64.	April 1, 2024 Affidavit of John Moynihan		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	(Byrne_000001-3)		
65.	X post by Defendant Patrick Byrne on April 8, 2024, including associated comments (RHB00717)		
66.	X post by Defendant Patrick Byrne on April 25, 2024 (RHB00107)		
67.	X post by @AzPinkLady on April 25, 2024, including associated comments (RHB00127)		
68.	Telegram post by Defendant Patrick Byrne on June 5, 2024, including associated comments (RHB00704)		
69.	X post by @AzPinkLady on June 30, 2024 (RHB00133)		
70.	X post by Defendant Patrick Byrne on July 22, 2024, including associated comments (RHB00138-140)		
71.	August 9, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Interrogatories, Set One		
72.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's Interrogatories, Set Two		
73.	September 5, 2024, Defendant Patrick Byrne's Responses to Plaintiff's		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	Interrogatories, Set Three		
74.	September 9, 2024, emails between Plaintiff's counsel of record and Jared Roberts, attorney for Ret. Lt. Gen. Michael Flynn (RHB00506-508)		
75.	September 17, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set One		
76.	September 19, 2024, Defendant Patrick Byrne's verified Further Responses to Plaintiff's Requests for Admissions, Set One		
77.	September 19, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests Admissions, Set Two		
78.	September 19, 2024 Letter to Capitol Times Media LLC from Plaintiff's counsel of record (RHB00445-505)		
79.	Telegram post by Defendant Patrick Byrne on October 7, 2024, including associated comments (RHB00705)		
80.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents,		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	Set Three		
81.	October 10, 2024, Defendant Patrick Byrne's Further Responses to Plaintiff's Requests for Production of Documents, Set Four		
82.	X post by Defendant Patrick Byrne on October 26, 2024, including associated comments (RHB00706)		
83.	October 29, 2024 Screenshot of Defendant Patrick Byrne's X Profile (RHB00707)		
84.	October 29, 2024 Screenshot of website enemywithindocuseries.com (RHB00708)		
85.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>The Deep Rig: How Election Fraud Cost Donal J. Trump the White House, By a Man Who did not Vote for Him: (or what to send friends who ask "Why do you doubt the integrity of Election 2020"</i> , for sale on Amazon.com (RHB00710)		
86.	October 29, 2024 Screenshot of Defendant Patrick Byrne's book, <i>Danger Close: Domestic Extremist #1 Comes Clean</i> , for sale on Amazon.com (RHB00709)		
87.	Defendant Patrick Byrne's book, <i>Danger</i>		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	<i>Close: Domestic Extremist #1 Comes Clean</i> , published on February 15, 2024 (RHB00509-RHB00694)		
88.	Truth Social post by @TXFreedom4Ever in 2023 (exact date unknown), including associated comments (RHB00173)		
89.	Truth Social post by @DEFCONMarine in 2023 (exact date unknown), including associated comments (RHB00178)		
90.	Truth Social post by @RealRogerStone in 2023 (exact date unknown), including associated comments (RHB00179)		
91.	Truth Social post by @AgnesBenko in 2023 (exact date unknown), including associated comments (RHB00180)		
92.	Truth Social post by @cziggy218 in 2023 (exact date unknown), including associated comments (RHB00181)		
93.	Truth Social post by @nancydunks in 2023 (exact date unknown), including associated comments (RHB00182)		
94.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00174)		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
95.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00176)		
96.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00170)		
97.	Truth Social post by Defendant Patrick Byrne in 2024 (exact date unknown), including associated comments (RHB00175)		
98.	Remittance Advance Invoice from Simon & Schuster UK Ltd., dated September 4, 2021 (RHB00411)		
99.	Royalty Statements from Simon & Schuster from March 2020 through September 2024 (RHB00412-443)		
100	Royalty Ledger from Book/Lab Literary Agency (date unknown) (RHB00444)		
101	Hunter Biden <i>Beautiful Things</i> Press Kit (RHB00189-265)		
102	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	2021-08-15-10-07-25"		
103	Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-15-10-07-25" (RHB00865)		
104	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-08-46-17"		
105	Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-08-46-17" (RHB00866)		
106	Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38"		
107	Transcript of Audio Recording produced by Defendant in Discovery on August 27, 2024 titled "HIGHLY CONFIDENTIAL – AUDIO-2021-08-24-14-43-38" (RHB00867-RHB00868)		
108	Defendant's passport photographs		



<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	produced by Defendant in discovery on November 4, 2024 (Byrne_0000024-Byrne_0000045)		
109	Defendant's "medical notes" provided by Defendant via email on November 4, 2024		
600.	Defendant Patrick Byrne's Notice of Taking of Deposition of Plaintiff Robert Hunter Biden (Deposition of Robert Hunter Biden taken on 08/16/2024)		
601.	Plaintiff's Objections to Defendant's Amended Notice of Deposition of Plaintiff Robert Hunter Biden (Deposition of Robert Hunter Biden taken on 08/16/2024)		
602.	Plaintiff Robert Hunter Biden's Rule 26 Supplemental Disclosures (Deposition of Robert Hunter Biden taken on 08/16/2024)		
603.	Plaintiff Robert Hunter Biden's Responses to Defendant Patrick M. Byrne's First Set of Interrogatories (Deposition of Robert Hunter Biden taken on 08/16/2024)		
604.	Stipulation for Protective Order and Order (Deposition of Robert Hunter Biden taken on 08/16/2024)		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
605.	Complaint for Damages for Defamation (Deposition of Robert Hunter Biden taken on 08/16/2024)		
606.	Affidavit dated April 1, 2024 (Deposition of Robert Hunter Biden taken on 08/16/2024)		
607.	U.S. Senate Committee on Finance Majority Staff Report (Deposition of Robert Hunter Biden taken on 08/16/2024)		
608.	The Government's Motions In Limine (Deposition of Robert Hunter Biden taken on 08/16/2024)		
609.	New York Post article entitled Smoking- gun email reveals how Hunter Biden introduced Ukrainian businessman to VP dad (Deposition of Robert Hunter Biden taken on 08/16/2024)		
610.	Independent article entitled Not many people are buying Hunter Biden's new book (Deposition of Robert Hunter Biden taken on 08/16/2024)		
611.	New York Post article entitled Hunter Biden's drug- and sex-fueled memoir is a		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	big fat flop (Deposition of Robert Hunter Biden taken on 08/16/2024)		
612.	Screenshot of an Amazon page for the book Laptop from Hell: Hunter Biden, Big Tech, and the Dirty Secrets the President Tried to Hide (Deposition of Robert Hunter Biden taken on 08/16/2024)		
613.	National Security article entitled Analysis of Hunter Biden's hard drive show he, his firm took in about \$11 million from 2013 to 2018, spent it fast (Deposition of Robert Hunter Biden taken on 08/16/2024)		
614.	Article entitled The Sordid Saga of Hunter Biden's Laptop (Deposition of Robert Hunter Biden taken on 08/16/2024)		
615.	Article entitled Republican Claims About Hunter Biden Offenses (Deposition of Robert Hunter Biden taken on 08/16/2024)		
616.	The Irish Times article entitled Hunter Biden, the 'big guy' and whether allegations of corruption represent a		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	scandal or a smear (Deposition of Robert Hunter Biden taken on 08/16/2024)		
617.	CBC News article entitled The scandals swirling around Hunter Biden - what we know, what we don't, and what's next (Deposition of Robert Hunter Biden taken on 08/16/2024)		
618.	Press Release entitled Comer, Greene Renew Request to DOJ on Mishandling of Hunter Biden Victims' Rights (Deposition of Robert Hunter Biden taken on 08/16/2024)		
619.	Article entitled Hunter Biden's universe of legal problems, briefly explained (Deposition of Robert Hunter Biden taken on 08/16/2024)		
620.	Indictment for Case No. 23-00061-MN (Deposition of Robert Hunter Biden taken on 08/16/2024)		
621.	New York Post article entitled Biden has a secret, illegal deal with Iran that gives mullahs everything they want (Deposition of Robert Hunter Biden taken on 08/16/2024)		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
622.	Fox News article entitled Hunter Biden took thousands from daughter's college fund for 'hookers and drugs': report (Deposition of Robert Hunter Biden taken on 08/16/2024)		
623.	Indictment for Case No. 2:23-cr-00599-MCS (Deposition of Robert Hunter Biden taken on 08/16/2024)		
624.	National Review article entitled The Indefensible, Shameless, Sordid Hunter Biden (Deposition of Robert Hunter Biden taken on 08/16/2024)		
625.	CNN Politics article entitled Hunter Biden's universe of legal problems, briefly explained (Deposition of Robert Hunter Biden taken on 08/16/2024)		
626.	The New York Times article entitled A Timeline of Hunter Biden's Life and Legal Troubles (Deposition of Robert Hunter Biden taken on 08/16/2024)		
627.	Marco Polo file BidenLaptopMedia.com (Deposition of Robert Hunter Biden taken on 08/16/2024)		

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
628.	Marco Polo Report on the Biden Laptop (Deposition of Robert Hunter Biden taken on 08/16/2024)		
629.	Defendant's Document Production (Byrne_000001-Byrne_000009) served on 08/27/2024		
630.	Defendant's Document Production (Byrne_000010-Byrne_000020) served on 10/15/2024		
631.	Defendant's Document Production (Byrne_000021) served on 10/15/2024		
632.	Defendant's Document Production (Byrne_000022-Byrne_000023) served on 10/16/2024		
633	Passport Pages for Byrne (Byrne 24 to 25)		
634	Tapes 2021		
635	Affidavit of Moynihan (Byrne 1-3)		
635	Byrne Amex Travel Documents (Byrne 10-20)		
636	Assistant Secretary of State Letter 8/26/11 (Byrne 4)		
637	Airline Itinerary Documents (Byrne 7-9)		

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
638	Complaint in Biden v. Ziegler Case No.: 2.23-cv-07591 (Rule 26f Disc 9/30/24)		
639	Complaint in Biden v. Giuliana Case No.: 2.23-cv-8032 (Rule 26f Disc 9/30/24)		
640	Complaint Issac v. Biden Case No.: 822C-10-012-CAK (Rule 26f Disc 9/30/24)		
641	US Senate Report on Corruption (Exh 620 Biden Deposition) Rule 26f Disc 9/30/24		
642	Motions in Limine Patrick Ho Case (Exh 621 Biden Deposition) Rule 26f Discl 9/30/24		
643	Book Laptop from Hell by Miranda Devine ;Rule 26f Discl 9/30/24		
644	Gun Case Indictment- Exh 633 to Biden Deposition; Rule 26f Disc 9/30/24		
645	Tax Case Indictment -Exh 638 to Biden Deposition; Rule 26f Disc 9/30/24		
646	Jury Verdict Gun Case; Rule 26f Discl 9/3024		
647	Dr. Nathan E. Lavin MD Report dated October 29, 2024, produced to plaintiff's		

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
	counsel per stipulation and order for IME; Rule 26f Discl 9/30/24		
648	Report on The Biden Laptop published by Marco Polo; Rule 26f Discl 9/30/24		
649	Patrick Ho Sanction; Rule 26f Discl 9/30/24		
650	Article: Hunter Biden took Daughter's College Money-Exh 635 to Biden Deposition; Rule 26f Discl 9/30/24		
651	Article on Hunter Biden's Lawsuit; Rule 26f Disc 9/30/24		
652	Article on Hunter Biden Art Sales; Rule 26f Discl dated 9/30/24		
653	Press Kit-Exh 609 to Deposition of Biden; Rule 26f Discl 9/30/24		
654	Press Kit-Exh 610 to Biden Deposition; Rule 26f Discl 9/3024		
655	Podcasts-Exh 611 to Biden Deposition; Rule 26f Discl 9/30/24		
656	International Press-Exh 612 to Biden Deposition; Rule 26f Dlsc 9/30/24		
657	NY Post Article on Burisma; Exh 622 to Biden Deposition; Rule 26f Discl 9/30/24		
658	Article on Biden's book sales; Exh 623 to Biden Deposition; Rule 26f Discl 9/30/24		



<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
659	Article on Biden's Book; Exh 624 Biden Deposition; Rule 26f Discl 9/30/24		
660	Laptop from Hell Screen Shot; Exh 625 to Biden Deposition; Rule 26f Discl 9/30/24		
661	Analysis of Biden laptop and payments; Exh 626 to Biden Deposition; Rule 26f Discl 9/30/24		
662	Biden Laptop Article, Exh. 627 to Biden Deposition; Rule 26f Discl. 9/30/24		
663	Scandal Article; Exh 629 to Biden Deposition; Rule 26f Discl 9/30/24		
664	Scandal Article; Exh 630 to Biden Deposition; Rule 26f Discl 9/30/24		
665	Article on Biden's Legal Problems; Exh 632 to Biden Deposition; Rule 26f Disclosure		
666	Article on Shameless Biden; Exh. 639 to Biden Deposition; Rule 26f Discl 9/30/24		
667	Article on Biden Legal Problems; Exh. 640 to Biden Deposition; Rule 26f Discl 9/30/24		
668	Marco Polo Pub on Biden File; Rule 26 Discl 9/30/24		

<u>Ex.</u> <u>No.</u>	<u>Description</u>	<u>Date</u> <u>Identified</u>	<u>Date</u> <u>Admitted</u>
669	Marco Polo Report on Biden; Exh 654 to Biden Deposition; Rule 26f Discl 9/30/24		
670	Article on Biden Law License Suspended; Rule 26f Discl 9/30/24		
671	Article on Romanian Influence Peddling by Biden; Rule 26f Discl 9/30/24		

Defendant reserves the right to request that the court permit the List of Exhibits to be amended to allow for additional exhibits to be included in the list pursuant to Federal Rule of Civil Procedure Section 16(e). Defendant also reserves pursuant to the right to pursuant to Federal Rule of Civil Procedure 16-2.3 to use impeachment exhibits that are not included on the Joint Exhibit List during the trial of this case.

Dated: November 5, 2024

EARLY SULLIVAN WRIGHT  
GIZER & MCRAE LLP

By: /s/ Zachary C. Hansen

BRYAN M. SULLIVAN (State Bar No. 209743)  
bsullivan@earlysullivan.com  
ZACHARY C. HANSEN (State Bar No. 325128)  
zhansen@earlysullivan.com  
EARLY SULLIVAN WRIGHT GIZER & McRAE LLP  
6420 Wilshire Boulevard, 17th Fl.  
Los Angeles, California 90048  
Telephone: (323) 301-4660  
Facsimile: (323) 301-4676

PAUL B. SALVATY (State Bar No. 171507)  
PSalvaty@winston.com

WINSTON & STRAWN LLP  
333 S. Grand Ave., 38th Fl.  
Los Angeles, CA 90071-1543  
Telephone: (213) 615-1700  
Facsimile: (213) 615-1750

ABBE DAVID LOWELL (*pro hac vice*  
forthcoming)  
AbbeLowellPublicOutreach@winston.  
com

WINSTON & STRAWN LLP  
1901 L St., N.W.  
Washington, D.C. 20036-3508  
Telephone: (202) 282-5000  
Facsimile: (202) 282-5100

*Attorneys for Plaintiff*  
*Robert Hunter Biden*

Dated: November 5, 2024

LAW OFFICES OF MICHAEL C. MURPHY

By: /s/ Michael C. Murphy

Michael C. Murphy, Esq.

Michael C. Murphy, Jr., Esq.

*Attorneys for Defendant*  
*Patrick Byrne*